

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARISE FOR SOCIAL JUSTICE;	)	
GOISTE?; NEW ENGLAND STATE-AREA	)	
CONFERENCE OF THE NAACP;	)	
REV. TALBERT W. SWAN, II;	)	
NORMAN W. OLIVER; DARLENE	)	
ANDERSON; GUMERSINDO GOMEZ;	)	
FRANK BUNTIN; RAFAEL RODRIQUEZ;	)	
and DIANA NURSE	)	Civil Action No. 05-30080-MAP
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
	)	
CITY OF SPRINGFIELD and SPRINGFIELD	)	
ELECTION COMMISSION	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' AFFIDAVIT OF DIRECT TESTIMONY  
DR. ROBERTA SCHAEFER, EXECUTIVE DIRECTOR,  
THE WORCESTER REGIONAL RESEARCH BUREAU**

1) My name is Roberta Schaefer, Ph.D. and I am the founding Executive Director of The Research Bureau. Under my direction, the Bureau has grown from a one-person office preparing studies on municipal issues to a five-person regional center of information and expertise in all areas of public policy in Central Massachusetts. I have testified before local, regional and state committees, and has been the featured speaker for public service organizations and business events. I hold a Bachelor of Arts degree. from Queens College of the City University of New York and a Masters and Ph.D. in Political Science from the University of Chicago. I have been a member of the Massachusetts Board of Education since 1996 and served as Vice-chair from 1998 to 2001. I am also a director of the Worcester Regional Chamber of Commerce, the Greater Worcester Community Foundation, and a corporator of Bay State Savings Bank and the Worcester Art Museum. In 2003, I was appointed by Governor Romney to serve as a member of the Regional Competitiveness Council for the Central Region.

2) The Worcester Regional Research Bureau is a private, non-profit organization that conducts independent, non-partisan research and analysis of public policy issues facing the greater Worcester region. By providing such policy data, the Bureau strives to promote more informed

public debate and the decision-making on financial, administrative, management and community issues facing Worcester's municipal government and the surrounding region. Since its founding in 1985, the Research Bureau has prepared over 130 reports on municipal and regional issues. The reports present detailed analyses of issues on which both citizens and public officials can base decisions that affect the welfare of everyone in the community. They are designed to stimulate thought and discussion among citizens, administrators and elected officials. As part of its public education effort, The Research Bureau sponsors the Francis A. Harrington Forums on Municipal Government, which highlight particular municipal issues that require immediate attention. The programs are free and open to all interested citizens and public officials. The panelists have included prominent individuals on both the state and local level who have expertise on the subject being discussed. The forums are hosted by local area colleges and are taped for rebroadcast a number of times on the local cable TV channel. In order to disseminate the results of its research, the Bureau staff maintains regular contact with public officials to keep them apprised of its work. It presents testimony before the City Council, committees of the Council, and various boards and commissions. The Research Bureau's staff addresses civic organizations and community groups on various municipal and regional issues. The Bureau has established a number of advisory committees to the Center for Community Performance Measurement with whom staff members meet regularly. The Bureau's views are solicited frequently by a number of organizations such as the Worcester Regional Chamber of Commerce, United Way of Central Massachusetts, and the Colleges of the Worcester Consortium.. The local media also seeks out the Bureau's positions, and comments favorably on Research Bureau reports, forums and other activities. The media coverage by the Telegram & Gazette, Charter Communications, WGMC-TV3, Worcester Business Journal, and WTAG Radio helps to disseminate the Research Bureau's work and to educate citizens about municipal and regional issues.

3) In 2005, Worcester Research Bureau was asked to conduct a study to determine if there was a relationship between the competitiveness of elections and city council salaries in Worcester and comparable cities. As reported in the 2000 Census, Worcester's population was 172,648 : 70.8 percent were Caucasian, 6.2 percent were African American, 4.8 percent were Asian, and 15.1 percent were Hispanic. Worcester is governed by a Council-Manager government with a "popularly elected" mayor. The city council acts as the legislative body, and the council-appointed manager handles the traditional day-to-day chief executive functions. The City Council is comprised of 11 members, six members of whom are elected at-large and five are elected from single-member districts (5-6 mixed method of election). Two of the City's ten wards are combined to form each of the five single-member districts. District 1 consists of Wards 1 and 2; District 2 consists of Wards 3 and 4; District 3 consists of Wards 5 and 6; District 4 consists of Wards 8 and 10; and District 5 consists of Wards 7 and 9. While none of the wards has a significant minority population, within recent history, a Hispanic candidate has been elected at-large to the City Council and served two terms. Currently an African American female serves on the School Committee, whose members are all elected at large.

4) Worcester's first charter, which went into effect in 1848, established a Mayor/Bicameral legislature form of government. Together, the two chambers -- the 11-member Board of Aldermen and the 30-member Common Council -- were vested with complete legislative powers. The mayor handled all administrative departments, though appointments to those

departments had to be approved by the two-chamber City Council. Seeking to replace the old outdated charter, Worcester voters in November 1947 approved of a change to Plan E municipal government. In effect from January 1949 until November 1985, this charter (as outlined in chapter 43 of the Massachusetts General Laws) established City Council/City Manager government. This type of governance, with modifications, has survived to the present day. Initially, Plan E government in Worcester was organized as a 9-member council (all at-large), a ceremonial mayor elected from the council by the councilors, and a council-appointed city manager. In 1983, Worcester voters again changed the city charter to increase the size of the City Council from nine members to eleven and the method by which some of them were elected, i.e., 5-6 mixed method of election.

5) The number of candidates running in Worcester elections has been declining since 1977. The Research Bureau study was prompted in part by concern that in recent years, fewer candidates were competing for public office, i.e., the City Council and the School Committee.

6) From 1957 to 1981, the City averaged over 30 candidates per election.

- a) Worcester City Council averaged 3.19 candidates per seat between 1957 to 1967
- b) Worcester City Council averaged 3.69 candidates per seat between 1969 to 1977
- c) Worcester City Council averaged 2.81 candidates per seat between 1979 to 1987.

7) Since 1981, the City has averaged 22 candidates per election, in spite of the fact that the 1985 Charter increased the size of the City Council from nine to 11.

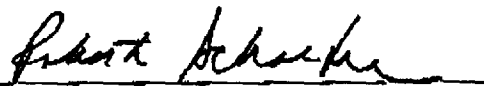
- a) Worcester City Council averaged 1.98 candidates per seat between 1989 to 1997.
- b) Worcester City Council averaged 1.77 candidates per seat between 1989 to 1995

8) Indeed, the “longest continued period of relatively low numbers of candidates per City Council seats has occurred since the 1985 Charter revisions that reduced the number of at-large seats while adding five district seats.” The survey concluded that “elections were more competitive before the change” to a 5-6 method of election. I hypothesized that “[i]t may be harder for challengers to have a reasonable hope of unseating an incumbent district councilor than an at-large incumbent, since at-large candidates are in principle running for *any one* of the at-large seats, while a candidate for a district councilor’s seat *must* defeat the incumbent in that particular seat.”

9) Additionally I concluded that “[j]ust as incumbents in Congress typically have a large advantage over challengers, simply because their opportunity to serve their constituents and win publicity as a result are greater, incumbent district representatives may win a reputation as ‘defenders’ of the interests of respective districts, or helpers to individual

constituents, that increases their advantage over challengers. (By contrast, at -large councilors cannot easily claim credit for policies that benefit a particular bloc of City voters)."

Signed under penalties of perjury this thirteenth day of February, 2007

A handwritten signature in cursive script, appearing to read "Roberta Schaefer", written over a horizontal line.

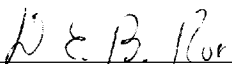
Dr. Roberta Schaefer

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing "Defendants' Affidavit of Direct Testimony Dr. Roberta Schaefer, Executive Director, The Worcester Regional Research Bureau" has been served on the following counsel of record on the 14th day of February 2007, via the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

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